

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEMETRIUS JOHNSON,)	
)	
<i>Plaintiff,</i>)	Case No. 20 CV 4156
)	
v.)	District Judge Sara L. Ellis
)	
REYNALDO GUEVARA, <i>et al.</i> ,)	Magistrate Judge Heather K. McShain
)	
<i>Defendants.</i>)	

DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES

Defendants City of Chicago, Reynaldo Guevara, Geri Lynn Yanow as Special Representative for Ernest Halvorsen (deceased) and William Erikson (deceased), by their undersigned counsel, respectfully move this Honorable Court for leave to file their Renewed Motion to Bifurcate Trial in excess of 15 pages, and in support thereof, state as follows:

1. Defendants' Motion to Bifurcate Trial is 22 substantive pages. (*See* Motion, attached hereto as Exhibit A).
2. To sufficiently address all relevant issues in the Motion, excess pages are needed.
3. Defendants recognize that this Court's time is valuable and does not wish to unnecessarily burden it with lengthy pleadings.
4. Defense counsel conferred with Plaintiff's counsel, who does not object to this request. Defendants do not object to a commensurate amount of pages for Plaintiff's response.

WHEREFORE, Defendants City of Chicago, Reynaldo Guevara, Geri Lynn Yanow as Special Representative for Ernest Halvorsen (deceased) and William Erikson (deceased), respectfully requests this Honorable Court grant its Motion for Leave to File Excess Pages in

excess of 15 pages their Renewed Motion to Bifurcate Trial, and for any other relief this Court deems just and reasonable.

Dated: July 18, 2025

Respectfully submitted,

/s/ Eileen E. Rosen
Eileen E. Rosen
One of the Attorneys for City of Chicago

Eileen E. Rosen
Theresa B. Carney
Catherine M. Barber
Austin G. Rahe
Lauren M. Ferrise
Rock Fusco & Connelly, LLC
333 W. Wacker Drive, 19th Floor
Chicago, IL 60606
312-474-1000
erosen@rfclaw.com

/s/ Timothy P. Scahill
Timothy P. Scahill
One of the Attorneys for Defendant Guevara

Timothy P. Scahill
Borkan & Scahill, Ltd.
20 S. Clark St., Suite 1700
Chicago, IL 60603
312-580-1030
tscahill@borkanscahill.com

/s/ Josh M. Engquist
Josh M. Engquist
*One of the Attorneys for deceased
Defendants Halvorsen and Erikson*

Josh M. Engquist
James G. Sotos
David A. Brueggen
Elizabeth R. Flemming
The Sotos Law Firm, P.C.
141 W. Jackson, Suite 1240A
Chicago, IL 606064
630-735-3300
jengquist@jsotoslaw.com